

**STORZER & ASSOCIATES**

A PROFESSIONAL CORPORATION

ROMAN P. STORZER

SIEGLINDE K. RATH\*

BLAIR LAZARUS STORZER\*\*

ROBIN N. PICK\*\*\*

SARAH E. CHILD\*\*\*\*

\* Admitted in Maryland & N.J.

\*\* Admitted in D.C., Maryland & Illinois

\*\*\* Admitted in California & Maryland

\*\*\*\* Admitted in D.C. & N.Y.

OF COUNSEL

ROBERT L. GREENE†

JOHN G. STEPANOVICH‡

† Admitted in N.Y.

‡ Admitted in Virginia, N.Y. & Ohio (inactive)

1025 CONNECTICUT AVENUE, NORTHWEST  
SUITE ONE THOUSAND  
WASHINGTON, D.C. 20036

(202) 857-9766  
FACSIMILE: (202) 315-3996

BALTIMORE OFFICE:

9433 COMMON BROOK ROAD

SUITE 208

OWINGS MILLS, MD 21117

(410) 559-6325

FACSIMILE: (202) 315-3996

[WWW.STORZERLAW.COM](http://WWW.STORZERLAW.COM)

March 4, 2020

**VIA ECF**

The Honorable Joseph A. Dickson  
United States Magistrate Judge  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

Re: *Valley Chabad Inc. v. Borough of Woodcliff Lake et al.*,  
Civil Action No. 2:16-cv-8087 (JLL) (JAD)

*United States v. Borough of Woodcliff Lake et al.*,  
Civil Action No. 2:18-cv-10511 (JLL) (JAD)

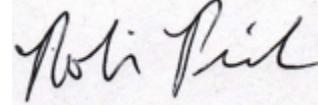
Dear Judge Dickson,

I am writing to you on behalf of all the parties in the above-referenced consolidated matters.

The parties in the private action have reached an impasse with respect to one of the terms in the Settlement Agreement and Consent Order in the private action. The parties to the United States' action are close to finalizing a proposed consent order, but the United States would not agree to a global settlement of this matter with the proposed term in the private settlement documents. In both actions, the parties have continued to work together in good faith since the last settlement conference and have otherwise largely reached agreement when reducing the material terms to writing.

On behalf of all parties, we therefore respectfully seek the Court's assistance with this matter and request that your Honor schedule a settlement conference, with counsel and their clients, before the Court.

Respectfully submitted,



Robin Pick, Esq.

cc: All counsel of record (via ECF)